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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,)
)
 Plaintiff,) Case No. 05-CR-60008-HO
)
 v.) **GOVERNMENT'S WITNESS LIST**
)
PIROUZ SEDAGHATY,)
)
 Defendant.)

The United States of America, through its undersigned counsel, herein submits the following list of witnesses it may call in its case-in-chief. A brief summary of expected testimony is also provided.

WITNESS NAME

Al-Haramain Islamic Foundation, Inc.
Custodian of Records

TESTIMONY

Will authenticate records provided by the Al-Haramain Islamic Foundation, Inc. in response to a grand jury subpoena.

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| Bank of America Custodian of Records | Will authenticate records provided by the Bank of America in response to a grand jury subpoena. |
| Colleen Anderson, Special Agent IRS-CID | Will review bank records and evidence obtained through a search warrant served on the premises of the Al-Haramain Islamic Foundation, Inc. |
| Daveed Garenstein-Ross | A former employee of the Al-Haramain Islamic Foundation, Inc. Will testify about observations made during his employment. |
| Debra Ingram, Branch Manager Bank of America | Will testify concerning a bank transaction with defendants Sedaghaty and Soliman Al-But'he. |
| Evan Kohlman | An expert on the conflict in Chechnya. He will provide background on the conflict, the role of the <i>mujahideen</i> in the conflict, and the funding of the <i>mujahideen</i> in Chechnya by the Al-Haramain Islamic Foundation. He will also introduce material promoted by the Al-Haramain Islamic Foundation on its website, and identify some of the items found on defendant Sedaghaty's computers. |
| FBI Arabic Translator | Will authenticate Arabic to English translations on government exhibits. |
| FBI Russian Translator | Will authenticate Russian to English translations on government exhibits. |
| First Escrow, Inc., Custodian of Records | Will authenticate records concerning a real estate transaction. |

Gregory Wooten, Internal Revenue Service

An expert witness on tax exempt organizations in the United States. He will provide testimony concerning a return filed by defendant Sedaghaty on behalf of the Al-Haramain Islamic Foundation, Inc., as well as background testimony on the requirements of a tax exempt charity.

Helen Moore, Customer Service Manager
Bank of America

Will testify concerning a bank transaction with defendants Sedaghaty and Soliman Al-But'he.

ICE Custodian of Records

Will authenticate immigration, airline flight and CMIR records.

IRS Service Center Representative

Will authenticate returns filed with the Internal Revenue Service by defendant Sedaghaty on behalf of the Al-Haramain Islamic Foundation, Inc.

Jeremy Christianson, Computer Specialist

A computer forensic expert. He will testify about the work he did in retrieving information from computer hard drives seized during a search warrant from the Al-Haramain Islamic Foundation, Inc.

Jeremy Jones, American Express
Custodian of Record

Will authenticate American Express records and provide background testimony on travelers' checks.

JP Morgan Chase Custodian of Record

Will authenticate bank records relevant to the case.

Linda Czemerys, Supervisory Special Agent IRS-CI

Will authenticate records and computer hard drives seized during a search warrant served on the Al-Haramain Islamic Foundation, Inc.

R.D. Kanan, Attorney at Law

Will provide testimony concerning a real estate transaction he engaged in on behalf of the Al-Haramain Islamic Foundation, Inc.

Richard Smith, Internal Revenue Service, Computer Investigative Specialist

Will provide testimony concerning computer hard drives seized during a search warrant from the Al-Haramain Islamic Foundation, Inc.

Sergey Ignatchenko, FSB Officer

Will testify about Al-Haramain Islamic Foundation's role in supporting the *mujahideen* in Chechnya and authenticate a conversation between the President of Al-Haramain and the commander of the *mujahideen* in Chechnya.

State of Oregon, Office of the Secretary of State, Corporation Division

Will authenticate records concerning the Al-Haramain Islamic Foundation, Inc.

Thomas Wilcox, CPA

Will testify that he was hired by defendant Sedaghaty to prepare returns to be filed by Al-Haramain with the Internal Revenue Service. He will further testify concerning information he received to prepare those returns, and conversations he had with defendant and others about financial transactions.

DATED this 10th day of August, 2009.

Respectfully submitted,

KENT S. ROBINSON
Acting United States Attorney

/s/ Christopher L. Cardani
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Assistant United States Attorney

/s/Charles F. Gorder, Jr.
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